

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<hr/>		:	ECF Case
JIMMY LYONS, <i>et al.</i> , individually and		:	
on behalf of all others similarly situated,		:	No. 13 Civ. 00513 (ALC)
		:	
Plaintiffs,		:	
		:	
vs.		:	<b>DECLARATION OF JESSICA</b>
		:	<b>OLICH IN SUPPORT OF</b>
		:	<b>MOTION TO DISMISS SECOND</b>
LITTON LOAN SERVICING LP, <i>et al.</i> ,		:	<b>AMENDED CLASS ACTION</b>
		:	<b>COMPLAINT</b>
		:	
Defendants.		:	
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I, Jessica Olich, declare as follows:

1. My name is Jessica Olich. The statements set forth herein are based upon my personal knowledge, or are based upon a personal review of the corporate records and/or publicly available information of Assurant, Inc. and information and/or records regarding American Security Insurance Company ("ASIC") and Standard Guaranty Insurance Company ("SGIC"), some of which was provided to me by other officers and employees of Assurant, Inc., ASIC, SGIC, or an affiliate thereof.

2. I am over 21 years of age and competent to testify to the statements set forth herein.

3. I am a Vice President and Assistant Secretary of Assurant, Inc. My business address is One Chase Manhattan Plaza, 41st Floor, New York, New York 10005.

4. I have reviewed the Second Amended Class Action Complaint filed in this case. I make this declaration in support of Assurant, Inc.'s, ASIC's and SGIC's motion to dismiss for lack of standing.

5. I am familiar with the public company known as “Assurant, Inc.,” which is a Delaware corporation whose shares trade on the New York Stock Exchange under the symbol AIZ, and whose principal place of business is New York, New York.

6. I am familiar with the organization of a group of companies that sometimes conduct business using the federally registered trade name “Assurant Specialty Property.” Assurant, Inc. merely owns this federally registered trade name (United States Patent and Trademark Office Registration No. 3224152); Assurant, Inc. does not operate, and has never operated, the businesses that sometimes use the trade name “Assurant Specialty Property.” The businesses that sometimes use the “Assurant Specialty Property” trade name include entities providing administration services and lender-placed insurance to the residential mortgage industry.

7. ASIC and SGIC are two of the businesses that sometimes use the “Assurant Specialty Property” trade name. Assurant, Inc. is the indirect parent of ASIC. The immediate parent of ASIC is Interfinancial Inc., and Assurant, Inc. is the immediate parent of Interfinancial Inc. ASIC is a Delaware corporation whose principal place of business is Atlanta, Georgia. ASIC is an insurance company. SGIC’s immediate parent is ASIC. SGIC is a Delaware corporation whose principal place of business is Atlanta, Georgia. SGIC is an insurance company.

8. Assurant, Inc. is not and never has been an insurance company, and has never sold, issued, underwritten or marketed insurance policies.

9. Assurant, Inc. does not collect and has never collected premiums paid for insurance policies.

10. Assurant, Inc. does not contract with residential mortgage lenders and servicers to provide any products or services related to lender-placed insurance.

11. Assurant, Inc. does not pay, and has never paid, commissions to any residential mortgage lender or servicer related to lender-placed insurance.

12. Assurant, Inc. is not involved in ASIC's or SGIC's daily decision making or business operations. Assurant, Inc. maintains separate books and corporate records from ASIC and SGIC. ASIC and SGIC generate their own business.

13. Assurant, Inc. did not and does not participate in, direct, or control the placement, procurement, or binding of insurance policies that ASIC and SGIC issue, including the coverage issued to plaintiffs in this case. Assurant, Inc. did not and does not set or participate in setting the policy terms for insurance policies issued by ASIC and SGIC, including the coverage issued to protect plaintiffs' property. None of the actuaries who work in the actuarial department in Miami and perform analyses in connection with ASIC's and SGIC's lender-placed insurance rates is employed by Assurant, Inc.

14. Assurant, Inc., ASIC and SGIC are not affiliated with American Modern Insurance Group ("AMIG") or American Modern Home Insurance Company ("AMHIC"). AMIG and AMHIC are direct competitors of ASIC and SGIC.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 14, 2014.

  
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Jessica Olich